

**REMARKS**

This paper is being provided in response to the Office Action mailed September 28, 2004, for the above-referenced application. In this response, Applicant have cancelled claims 1-12 without prejudice or disclaimer of the subject matter thereof and added new claims 13-31 to clarify that which Applicant considers to be the invention. Applicant respectfully submits that the new claims are fully supported by the originally-filed specification.

The rejection of claims 1-8 and 10 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,986,863 to Oh (hereinafter “Oh”) in view of U.S. Patent No. 5,652,456 to Lien (hereinafter “Lien”) and the rejection of claims 9, 11 and 12 under 35 U.S.C. 103(a) as being unpatentable over Oh in view of Lien and further in view of Applicant’s Admitted Prior Art (hereinafter “Applicant’s APA”) have been rendered moot by the cancellation of claims 1-12 herein.

Applicant has added new claims 13-31 and respectfully submit that these claims are patentable over the cited prior art, as discussed below.

The Oh reference discloses electrostatic discharge protection circuits including circumferential guard rings.

The Lien reference discloses a semiconductor structure containing multiple optimized well regions.

The Office Action cites Fig. 4B of Applicant's APA as disclosing an isolation region (940) with diffusion region (945) formed within.

New independent claim 13 recites at least the features of an electrostatic discharge device including first, second and third wells of either first or second conduction types and that cooperate with one another to perform a bipolar action. In contrast, Oh discloses that a p-well 40 (third well) acts as an isolation region between n-well regions 20 and 30. (See, for example, col. 3, lines 62-63 and Fig. 4 of Oh.) Similarly, Lien discloses that diffusion regions 850 and 851 act as isolation regions. (See, for example, col. 8, lines 45-49 and Fig. 8 of Lien.) Further, Applicant's APA does not disclose the above-noted features. Accordingly, Applicant respectfully submits that neither Oh, Lien nor Applicant's APA, taken alone or in combination, teach or fairly suggest at least the above-noted features as claimed by Applicant.

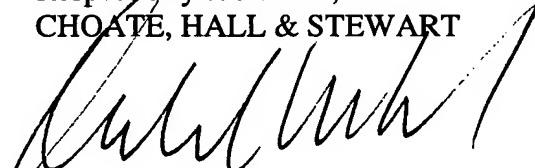
New independent claim 20 recites at least the features of an electrostatic discharge device including a diffusion region in a third well that is exposed in a surface of a semiconductor substrate. In contrast, Oh does not disclose diffusion regions in the p-well 40 (third well) (see Fig. 4 of Oh) and Lien discloses diffusion regions 850, 851 in a well 870 (third well) that are not exposed in a surface of semiconductor substrate (see Fig. 8 of Lien). Further, Applicant's APA does not disclose the above-noted features. Accordingly, Applicant respectfully submits that neither Oh, Lien nor Applicant's APA, taken alone or in combination, teach or fairly suggest at least the above-noted features as claimed by Applicant.

New independent claim 26 recites at least the features of an electrostatic discharge device including a diffusion region in a third well that is divided into a plurality of portions, each of the

portions being apart from each other. In contrast, Oh does not disclose diffusion regions in the p-well 40 (see Fig. 4 of Oh) and Lien discloses diffusion regions 850, 851 in well 870 that are not apart from each other (see Fig. 8 of Lien). Further, Applicant's APA does not disclose the above-noted features. Applicant respectfully submit that neither Oh, Lien nor Applicant's APA, taken alone or in combination, teach or fairly suggest at least the above-noted features as claimed by Applicant.

Based on the above, Applicants respectfully request that the Examiner reconsider and withdraw all outstanding rejections and objections. Favorable consideration and allowance are earnestly solicited. Should there be any questions after reviewing this paper, the Examiner is invited to contact the undersigned at 617-248-4038.

Respectfully submitted,  
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